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AO 91 (Rev. 11/11) Criminal Complaint

AUSA Kelly Greening (312) 353-4095

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

FEB 14 2018

UNITED STATES OF AMERICA

v.

CASE NUMBER:

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

ADAM SPRENGER

**18CR 105****CRIMINAL COMPLAINT****MAGISTRATE JUDGE MARTIN**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 14, 2018, at Arlington Heights, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

Title 18, United States Code, Section  
2252A(a)(5)(B)

*Offense Description*

knowingly possessed material, namely a Micro SD card bearing serial number KPABT27PB629, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not obtained 12 years of age, such image having been shipped and transported using any means or facility of interstate and foreign commerce, and such image having been produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



ANNA HOCHBAUM

Task Force Officer, Federal Bureau of  
Investigation (FBI)

Sworn to before me and signed in my presence.

Date: February 14, 2018


*Judge's signature*

City and state: Chicago, Illinois

DANIEL G. MARTIN, U.S. Magistrate Judge

*Printed name and Title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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**AFFIDAVIT**

I, ANNA HOCHBAUM, being duly sworn, state as follows:

1. I am an Investigator with the Investigations Bureau of the Cook County State's Attorney's Office. I have been so employed since approximately July 2014. Since July 2016, I have been a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI).

2. As part of my duties as an FBI Task Force Officer, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt, and possession of child pornography, in violation of Title 18, United States Code, Sections 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media, including computer media.

3. This affidavit is submitted in support of a criminal complaint alleging that ADAM SPRENGER has possessed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging SPRENGER with possession of child pornography, I have not included each and every fact known to me concerning this investigation. I have set

forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents who have knowledge of the events and circumstances described herein, and interviews of witnesses and other individuals.

## **I. FACTS SUPPORTING PROBABLE CAUSE**

### **A. Background Investigation**

5. Since approximately June 2016, law enforcement in this investigation has been investigating individuals posting images and videos that depict the sexual exploitation of children on websites and applications, including Chatstep and Kik Messenger ("Kik").

6. Based on my training and experience, I know that Chatstep is a website that allows users to create, or enter, an online chatroom. Users can chat using a nickname or anonymously. There is no account required to use Chatstep, but users can create accounts for photo sharing features and private messenger.

7. Based upon my training and experience, I know that Kik is an application that allows users to choose user names and communicate with other users over the internet. Kik allows users to send and receive messages and images, to and from individuals or groups of individuals. Kik users can communicate in chat groups. A chat group is a forum where multiple users can communicate with each other simultaneously. In a chat group, users' communications can be viewed by all the other

members participating in that group. A Kik chat group has multiple identifiers, including a group name and a “hashtag.”

**1. SPRENGER and Individual A**

8. On or about November 7, 2017, January 19, 2018, and February 1, 2018, I and other law enforcement agents interviewed Individual A, who agreed to speak with us voluntarily.<sup>1</sup> During the course of the initial interview, Individual A admitted to viewing child pornography within various applications and websites, such as Kik and Chatstep.

9. According to Individual A, he does not personally share child pornography or download it to his devices. However, Individual A stated one of the ways he helps with his urges is to chat with and meet up with other adult men who share an interest in children. When they meet, the men engage in fantasy talk and “get each other off.”

10. Individual A shared information regarding an individual named “Adam,” who he met on Kik in 2015. As explained below in paragraph 15, law enforcement identified “Adam” as SPRENGER, and Individual A identified a photograph of SPRENGER as the person he knows as “Adam.” Individual A stated that SPRENGER’s Kik display name was “alwaysunderneath,” and Individual A

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<sup>1</sup> A check of law enforcement databases showed that Individual A is a registered sex offender, who was convicted in 2009 of Indecent Solicitation of a Child and Aggravated Criminal Sexual Abuse/Victim 13-16. At the time of FBI’s interviews of Individual A, FBI was investigating Individual A for sharing child erotica on the Internet.

referred to SPRENGER as “always.”<sup>2</sup> According to Individual A, SPRENGER’s Kik profile picture was of “curtains.”

11. According to Individual A, he met SPRENGER at SPRENGER’s residence on two occasions, both weekdays between the hours of 11:00 a.m. and 2:00 p.m., in or around the winter of 2015-2016. On both occasions, Individual A drove to SPRENGER’s house, which, Individual A recalled, is a two-story residence with older gray siding and a detached garage.

12. Individual A described SPRENGER as a white male, approximately 35 to 40 years old, about 5’10” to 5’11”, with short brown hair and a thin to average build. According to Individual A, SPRENGER never told Individual A his name, but Individual A overheard it. In law enforcement’s initial interview with Individual A, he stated that he had overheard someone call SPRENGER’s first name while at his home. Individual A later stated that while at SPRENGER’s home, SPRENGER received a phone call, and the person on the phone called him “Adam.”

13. According to Individual A, on both occasions that he met with SPRENGER at SPRENGER’s residence, SPRENGER pulled out his phone and played videos depicting child pornography. SPRENGER held the phone in such a way that they could both view the screen. Individual A stated that SPRENGER reached into his pants pocket and pulled out “a stack” of micro secure digital (“SD”) cards. SPRENGER and Individual A masturbated to the child pornography. As Individual

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<sup>2</sup> Individual A did not recall SPRENGER’s Kik username, which is different from the Kik display name.

A and SPRENGER masturbated, SPRENGER periodically changed the micro SD cards in his phone and played additional videos of child pornography. SPRENGER kept the micro SD cards on the nightstand near him, and later put them back into his pants pocket.

14. Individual A stated most of the videos he watched on SPRENGER's phone were of girls between the ages of 11 and 15 masturbating by themselves. Individual A stated that SPRENGER also played videos that depicted girls between the ages of 7 and 10 performing oral sex on adult males. Individual A stated that SPRENGER also played videos that depicted girls between the ages of 7 and 10 having their vaginas penetrated by an adult male's penis.

15. Individual A agreed to look on Google Maps to locate SPRENGER's house. Based on this and other information, law enforcement determined the location of the residence of ADAM SPRENGER. FBI TFO Anthony Stack then searched Facebook for "Adam Sprenger" in Arlington Heights, and found a public post from 2011 by Facebook user "Adam Sprenger." TFO Stack accessed the profile, and found a picture of two male subjects under the photos section. TFO Stack opened this photo and showed it to Individual A, who immediately identified the subject on the right, wearing the plaid shirt, as "Adam."

## **2. SPRENGER and Kik Messenger Chat**

16. In or around November 2017, Homeland Security Investigations (HSI) received information from foreign law enforcement sources regarding a chat that took place between a foreign law enforcement officer acting in an undercover capacity ("the

UC”) and an individual over Kik Messenger, as part of a broader child pornography investigation.

17. On or about November 13, 2017, and November 14, 2017, the UC communicated via email and Kik with the user of upinsideher@yahoo.com. The user of upinsideher@yahoo.com informed the UC that he/she only chats on the Kik messaging application and provided the username, “WHATSINURNAME.”

18. The UC then engaged in a Kik chat with Kik user WHATSINURNAME.<sup>3</sup> During this conversation, WHATSINURNAME stated to the UC that he had “rubbed my cock on [minor girls’] face and hands while their sleeping”. The UC stated, “fuk yeah! thats great. did you get pics of your cok on their pretty faces? where did you blow?” WHATSINURNAME replied, “Yes. And on the bed or floor next to them.”

19. The UC asked, in summary, to see pictures of WHATSINURNAME’s penis on the girls. WHATSINURNAME declined to share them with the UC right now. The UC offered to email WHATSINURNAME pictures of girls’ underwear and asked if WHATSINURNAME was ok with email. WHATSINURNAME replied, “I don’t like email. Way too traceable.” The UC then sent images of what appeared to be female underwear and asked, in summary, for WHATSINURNAME to send pictures.

20. WHATSINURNAME sent a video to the UC over Kik. I have reviewed this video. The video depicts what appears to be an adult male rubbing his penis with his hand and standing over what appears to be a clothed individual lying down on

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<sup>3</sup> The summary of the conversation contained in this affidavit does not represent the entire conversation that occurred between the identified individuals.

sheets. During the video, the camera is focused on the male's penis and the buttocks of the clothed individual, while the male ejaculates on the clothed individual's buttocks. The video is approximately 28 seconds in length.

21. On or about November 30, 2017, an HSI administrative subpoena was issued to Yahoo requesting subscriber information for upinsideher@yahoo.com. Yahoo provided the user's full name as "Mr Whatsin Aname" and a telephone number.

22. On or about February 2, 2018, an HSI administrative subpoena was issued to Kik requesting subscriber information and IP login information associated with Kik user WHATSINURNAME. Kik provided the user's listed first and last name as "Always Underneath" and email address as whatsinurname@yahoo.com. According to KIK, the device type last registered with WHATSINURNAME on or about December 6, 2017, is an Android model SM-G930V and the "brand" is identified as Verizon.<sup>4</sup> In addition, Kik records showed that this user logged on to Kik from IP address 73.210.108.100 on multiple occasions between December 6, 2017, and February 5, 2018.

23. Comcast records received in December 2017 indicate that between August and November 2017, IP address 73.210.108.100 was subscribed to by ADAM SPRENGER, at SPRENGER's residence in Arlington Heights. Comcast also provided a telephone number for SPRENGER which matched the telephone number provided by Yahoo. *See* ¶ 21.

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<sup>4</sup> A Google search shows that model SM-G930V is a Samsung Galaxy S7.

**B. Search of SPRENGER's residence**

24. On or about February 14, 2018, pursuant to a federal search warrant, law enforcement agents searched SPRENGER's residence in Arlington Heights. SPRENGER and three other occupants were present at various time throughout the search, including Individual B.

25. During the search, law enforcement recovered, among other items, a Verizon Samsung Galaxy S7. SPRENGER stated that the "phone on the counter" belonged to him; the Samsung Galaxy S7 was the only phone on the counter at the time. Individual B, who also resides at the residence, identified the Samsung Galaxy S7 as SPRENGER's phone by identifying the phone case and matching the number on the SIM card inside the phone to the number assigned to SPRENGER's device on Individual B's Verizon account. A micro SD card was found inside the Samsung Galaxy S7. Additional micro SD cards were recovered from the residence and garage.

26. According to product information found on the micro SD card inside the Samsung Galaxy S7, the micro SD card was manufactured in the Philippines. The Samsung Galaxy S7 was manufactured in Vietnam.

27. Forensic examiners conducted a preliminary review of the contents of the Samsung Galaxy S7 and the contents of the micro SD card found inside the Samsung phone. Based on the training and experience of the forensic examiners, the micro SD card found inside the Samsung phone contained a number of images that constitute child pornography. During this review, forensic examiners observed image files depicting suspected prepubescent girls, including toddlers, engaged in sexual

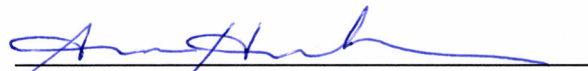
acts with adult men. For example, one of the images depicts a nude toddler girl with her mouth around an adult man's erect penis. Another one of the images depicted an identified prepubescent girl wearing an open denim jacket with her breast and vagina exposed. The prepubescent girl is using her hand to spread her vagina towards the camera.

28. After being read his *Miranda* rights and signing a written waiver of his rights, SPRENGER agreed to speak with law enforcement. During that interview, SPRENGER admitted to being the user of upinsideher@yahoo.com. SPRENGER stated that he uses that email account to post and respond to advertisements on Craigslist seeking other men who share an interest in teenaged girls and a "panty fetish." SPRENGER admitted having met with three or four men at his residence and having masturbated together. SPRENGER denied using Kik and stated that he has never had physical contact with minors.

## II. CONCLUSION

29. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about February 14, 2018, SPRENGER knowingly possessed material, namely a micro SD card, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not obtained 12 years of age, such image having been shipped and transported in and affecting interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FURTHER AFFIANT SAYETH NOT.



ANNA HOCHBAUM

Task Force Officer, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on February 14, 2018.



DANIEL G. MARTIN

United States Magistrate Judge